

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP,

*Defendant.*

No. 22 Civ. 10016 (LAK) (JLC)

**DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT OF  
PLAINTIFF E. JEAN CARROLL'S OMNIBUS MOTION IN LIMINE**

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's omnibus motion in limine.

3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the official transcript of Robert J. Fisher's deposition, which was taken in this action on February 6, 2023.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the Expert Report of Robert J. Fisher, dated January 30, 2023.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Expert Report of Ashlee Humphreys, PhD, dated January 9, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
February 23, 2023

  
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Roberta A. Kaplan